

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,
HARPERCOLLINS PUBLISHERS LLC, JOHN
WILEY & SONS, INC., and PENGUIN RANDOM
HOUSE LLC,

Plaintiffs,

-against-

INTERNET ARCHIVE and DOES 1 through 5,
inclusive,

Defendants.

Case No. 1:20-CV-04160-JGK

DECLARATION OF THEODORE M. SHAPIRO

I, Theodore M. Shapiro, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. This declaration is submitted in support of my application to appear Pro Hac Vice in the above-captioned matter.

2. I am a member in good standing of the Bar of the Commonwealth of Massachusetts. A true and correct copy of a certificate of good standing from the Bar of the Commonwealth of Massachusetts is submitted herewith.

3. I have never been convicted of a felony.

4. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

5. There are no disciplinary proceedings presently pending against me in any court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 8, 2022 in Brussels, Belgium.

/s/ Theodore M. Shapiro
Theodore M. Shapiro

WIGGIN LLP
Rue de Namur, 72
Brussels, 1000 Belgium
Phone: +32 (0) 2 892 1104
Email: Ted.Shapiro@wiggin.eu